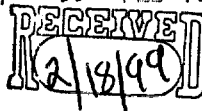




5227 '99 FEB 19 P3 06



February 15, 1999

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington DC 20204

Re: Notification of DSHEA nutritional support claim for AmeriFIT Vinpocetine Dietary Supplement

Dear Sir or Madam:

The purpose of this letter is to provide notification pursuant to section 403 (r)(6) of the Federal Food, Drug, and Cosmetic Act ("the Act") and 7 C.F.R. § 101.93 that AmeriFIT, Inc., is marketing a dietary supplement that bears a statement of nutritional support as defined in section 403 (r)(6) of the Act.

The labeling for Vinpocetine bears the following statements:

"Cerebral Oxygenator for Memory Support"

"... for memory and cognition"

"It helps increase the flow of blood and oxygen to the brain to support peak mental functioning"

"Green Tea has also been added to energize the body and mind, supporting mental focus"

"(referring to Green Tea) This stimulating herb has been used in Asian countries for centuries to energize both body and mind. It is also an antioxidant, Antioxidants can help protect the body from pollutants"

"For healthy brain functioning"

"Vinpocetine helps the brain work more efficiently because it supports activities which are vital to healthy brain functioning"

"It increases the rate at which brain cells produce ATP. This molecule is the energy source for cells and helps keep the mind energized"

"It increases the utilization of oxygen and glucose, a necessary part of brain metabolism"

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Corporate Headquarters
166 Highland Park Drive
Bloomfield, CT 06002
1-800-990-FIRM (3476)
(860) 242-FIRM (3476)
FAX: (860) 243-9400

“(Vinpocetine) is designed for adults concerned about the memory or concentration. We recommend it for those experiencing normal absentmindedness, as well as older men and women who may be more concerned with brain health, especially when those concerns are related to cerebral circulation”

AmeriFIT, Inc. has on file substantiation that the above statements are truthful and not misleading. To the best of my knowledge, the information contained in this notice is complete and accurate.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Larsen', with a long horizontal line extending to the right.

Craig Larsen
Director of Product Development and Quality Assurance